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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P.
LUHANA IN SUPPORT OF
ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY’S MATERIAL
SHOULD BE FILED UNDER SEAL**

This Document Relates to:

ALL CASES

I, Roopal P. Luhana declare:

1. I am a partner of Chaffin Luhana, LLP, an attorney licensed in the State of New York, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated confidential by Defendants or contain references to documents produced and marked confidential by Defendants, Plaintiffs filed the following under seal:

Document	Description	Designating Party
Exhibit 1	Excerpt of document produced by Defendants, Bates stamped UBER_JCCP_MDL_000031233, designated as Confidential, containing confidential information about Uber’s Flack system and non-public employee email addresses	Defendants
Exhibit 2	Excerpt of production letter from counsel for Defendants to counsel for Plaintiffs dated August 19, 2024, containing link to secure file transfer and user name.	Defendants

Document	Description	Designating Party
Exhibit 3	Draft Joint Discovery Letter Brief Relating to Safety Data	Defendants
Exhibit 4	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Todd Gaddis, containing confidential information about Uber's Flack system	Defendants
Exhibit D	Email correspondence between the Parties dated July 31 – August 5, 2025	Defendants
Exhibit E	Correspondence between the Parties dated August 7 – September 15, 2025	Defendants
Exhibit F	Letter dated January 16, 2024 from counsel for Defendants to counsel for Plaintiffs pursuant to the Court's January 9, 2024 Order	Defendants
Exhibit G	Letter dated February 22, 2024 from counsel for Defendants to counsel for Plaintiffs responding to Plaintiffs' January 29, 2024 letter	Defendants
Exhibit H	Email correspondence between the parties dated April 19 – May 10, 2024	Defendants
Exhibit I	January 18, 2024 declaration of Katherine McDonald	Defendants
Exhibit K	Correspondence from counsel for Defendants to counsel for Plaintiffs dated June 21, 2024	Defendants
Exhibit N	Certification of Katherine McDonald dated January 10, 2025	Defendants
Exhibit O	Certification of Katherine McDonald dated February 25, 2025	Defendants
Exhibit P	Certification of Katherine McDonald dated March 6, 2025	Defendants
Exhibit Q	Exhibit to April 24, 2025 JCCP deposition of Katherine McDonald	Defendants
Exhibit R	Email correspondence between the parties dated April 28 – May 1, 2025	Defendants
Exhibit S	Draft Joint Discovery Letter Brief Relating to Safety Data	Defendants

Document	Description	Designating Party
Exhibit T	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Todd Gaddis, containing confidential information about Uber's Flack system	Defendants
Exhibit X	Excerpts of transcript of April 24, 2025 deposition of Katy R. McDonald, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Bliss and Jira systems	Defendants
Exhibit Y	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Katy R. McDonald, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Flack system	Defendants
Exhibit Z	Excerpt of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Hannah Nilles, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Flack system	Defendants

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd day of September, 2025 in Brooklyn, New York.

/s/Roopal P. Luhana

Roopal P. Luhana